



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

JUL 19 2013

Mr. John Hicks, Transportation Development Analyst
St. Louis County Department of Highways and Traffic
Highway Planning Division-8th Floor
121 South Meramec Avenue
Clayton, MO 63105

Dear Mr. Hicks:

RE: Review of Draft Environmental Impact Statement for South County Connector in St. Louis County, Missouri, FHWA-MO-EIS-13-01-D

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the South County Connector in St. Louis County, Missouri. Our review is provided pursuant to the National Environmental Policy Act 42 U.S.C. 4231, Council on Environmental Quality regulations 40 C.F.R. Parts 1500-1508, and Section 309 of the Clean Air Act. The DEIS was assigned the CEQ number 20130112.

Based on our overall review and the level of our comments, the EPA has rated the DEIS for this project Lack of Objections (LO). A copy of EPA's rating descriptions is provided as an enclosure to this letter.

While a preferred alternative has not yet been identified, the DEIS outlines the environmental impacts of various alternatives considered to improve roadway connectivity between south St. Louis County and central St. Louis county, improve traffic safety and operations, and provide sufficient roadway capacity to reduce congestion on the roadway network. The DEIS does an exemplary job of conveying essential project information in a "reader-friendly" format. We do, however, offer a few comments and suggestions for your consideration as you move towards selecting a preferred alternative and the subsequent preparation of the Final EIS.

Regarding the mitigation measures outlined in sections 4.6.4 Floodplains and 4.8.4 Threatened or Endangered Species, there may be opportunity to join these mitigation efforts together. Section 4.6.4 included the possibility of native tree and riparian plantings within the compensatory storage areas. If feasible, please consider including in these plantings tree and riparian species that would foster and promote foraging and roosting habitat for the state and federally listed Indiana Bat.

Additionally, the Laclede Gas Company property at 4118 Shrewsbury Avenue has been identified as both a property eligible for listing in the National Register of Historic Places and as a Superfund site, currently listed in the Comprehensive Environmental Response, Compensation, and Liability Information System database. While remediation actions have been completed at this site, residual soil and groundwater contamination may remain. Build Alternative 1 could include the removal or alteration of one or two structures, thereby potentially diminishing the integrity of the features necessary for qualification for NRHP listing, and would therefore result in an adverse effect on this property.



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However, while Build Alternative 2 would not result in an adverse effect on the property with respect to NRHP, this alternative includes bridging over the undeveloped eastern edge of the property, where high levels of soil contaminants are reportedly located. Please take this into consideration in your determination of a final preferred alternative. Furthermore, please coordinate with the EPA Region 7 project manager for this site, Ms. Jamie Bernard-Drakey, regarding any necessary or recommended actions pertaining to the Superfund status. Jamie may be contacted at 913-551-7400 or via email at bernard-drakey.jamie@epa.gov.

Due to the age of the buildings located on the Laclede Gas Company property, asbestos-containing materials and/or lead-containing paint may be present in buildings. As is standard, EPA would like to reiterate that some demolition activities may involve contact with asbestos-containing materials, electrical components that contain mercury (switches, thermostats) and polychlorinated biphenyls (fluorescent light ballasts or transformers), and structural components that may have lead paint coatings. Demolitions should be undertaken with due regard for worker safety and regulatory compliance. The Missouri Department of Natural Resources regulates these particular concerns. If these issues are present in the work to be undertaken, I would advise contacting MDNR for specific guidelines.

We commend your coordination efforts with various other agencies and entities throughout the development of this project. We would encourage continued coordination with local, state, and federal agencies to ensure that all laws, ordinances, and regulations are followed and all necessary permits acquired. Engaging assorted environmental and community groups and area planning organizations in the project development plans and discussions provides opportunity for mutually beneficial partnerships and better preparedness for future planning efforts. For example, for projects that may involve right of way for future utility or multi-modal installations, it would be prudent to proactively establish partnerships that could foster collaborative efforts and identify opportunities to incorporate future undertakings in current actions. Establishing these coordination efforts early promotes cohesion and could help in the determination of potential cumulative impacts and well as incorporate preemptive ROWs into current projects.

Thank you for the opportunity to provide our comments regarding this project. If you have any questions, please contact me at 913-551-7146 or via email at robichaud.jeffery@epa.gov; or you may contact Amber Tucker, NEPA Reviewer, at 913-551-7565 or via email at tucker.amber@epa.gov.

Sincerely,



Jeffery Robichaud
Deputy Director
Environmental Services Division

Enclosure

Draft Environmental Impact Statement Rating Definitions

Environmental Impact of the Action

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

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Clayton, MO 63105

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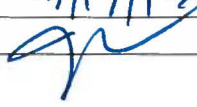
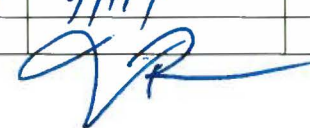
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CONCURRENCE: Edie:7803:071913:H/ENSV/IO/NEPA/Tucker/2013/DEIS South County Connector.docx				
DIV/BR	ENSV/NEPA	ENSV		
NAME	Tucker	Robichaud		
DATE	7/19/13	7/19/		
INITIALS				

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Sincerely,

Jeffery Robichaud
Deputy Director
Environmental Services Division

Enclosure